

Certified Translation

Welcome to

Walgreens

Orientation Manual

For Employees of the

Walgreens Pharmacies of Puerto Rico

Our wish is to be the Best,
the Best Shopping Place and
the Best work place.

C.R. Walgreen III

Group of *Walgreens* companies

Your Responsibility to Comply with the Company's Norms and Expectations

All of Walgreens' employees are responsible for following the work norms and expectations. Walgreens considers this principle to be very important and, therefore, utilizes surveillance cameras at different places in the pharmacies. In addition, there are persons who pretend to be clients (Mystery Shoppers) to make sure that each procedure is followed to the letter. These persons visit the pharmacies periodically, purchase products and render reports about productivity, procedures, courtesy and service. The reports describe the efficiency of the employees and the compliance with Company's norms. Obviously, these reports affect the reputation of each pharmacy and that of its employees. Therefore, it's important to understand that the violations to Walgreens' norms and expectations may result in the termination of the employment. Make sure of speaking with your Manager about any norm or policy which you don't understand. Using good judgment and becoming acquainted with the policies that affect your work is your responsibility. Do not wait until committing any violation or committing a fault to any norm; if you have any doubt, we exhort you to request information, in writing if necessary, from any of your Managers, for the purpose of preventing any violation or fault to any norm.

Service to the Client

Our clients and employees are the foundations of Walgreens. Without clients or employees, Walgreens would not be able to operate. Therefore, we expect that each Walgreens employee shall provide the kind of service that motivates the clients to come back. This quality of service to the client includes, but is not limited to:

- Rapid acknowledgment of our clients
- Courteous replies to questions from the clients, and assistance in finding the merchandise.
- Quick check outs.
- Thank the clients sincerely upon their leaving our pharmacies for their sponsorship.
- Make all the efforts possible to help the clients, and
- Never be disrespectful to any of our clients.

2. **Policies Relating to your Employment**

2.1 **Equal Employment Opportunities**

Walgreens is an **Equal Opportunity** Employer and is committed to offering equal opportunities to all the employees and applicants. All the personnel practices, including employment, promotion and training shall be based on all the qualifications and the capability of the person, regardless of the age, race, color, sex, origin or social condition, nationality, political affiliation, political or religious ideas, citizenship status pursuant to the Reform and Control Immigration Act of 1986, civil status victim of domestic violence, disability, or any other protected condition in accordance with the requirements of the local, state and federal laws.

Preferential treatment in regard to all the aspects of the employment relationship is prohibited. Our employees and employment candidates shall be objectively and fairly evaluated in all the practices of employment including, but without limitation to:

- Recruitment and location.
- Work assignments
- Promotions, demotions, or transfers
- Corrective measures
- Suspensions, employment terminations, or re-employment
- Training, social education, or recreational programs
- Compensation and benefits

Walgreens totally forbids any employee, contractor, supplier or agent being involved or participating in conduct of a discriminatory nature - including inappropriate, offensive or demeaning comments which promote a discriminatory environment, due to any of the reasons protected by law. Any Walgreens employee who carries out any action of a discriminatory nature shall be subject to corrective measures which may include termination of employment.

This policy applies to all the persons who apply for work and to all the employees.

3.26 Walgreens' Benefits Fund

Walgreens' Benefits Fund helps regular employees who have suffered a serious financial disgrace. The committee directing the Benefits Fund studies the cases presented to it to determine the need and how much aid should be provided.

When a long-term illness, accidents, death, fire, floods or other disasters cause situations that are outside the ability of the person to handle the matter, and when other resources are not available, or are not sufficient to provide the necessary assistance, an application must be submitted to the Walgreens' Benefits Fund. The Department of Services to the Employees shall provide the application forms faced with the request on the part of the Unit Manager, the District Manager or the Head of the Department.

The request for assistance must fully explain the nature of the disgrace and approximately the time that it will last. The application must also contain an appropriate recommendation on the part of the District Manager or Head of the Department, with regard to the level of assistance, and as to whether it shall be payable in a lump sum or in monthly installments. If it's probable that additional assistance shall be necessary further on, this must be mentioned in the application, as well as the estimated amount of that additional assistance.

No assistance may be granted unless the application contains the Information which demonstrates without doubt that the need exists such and as it has been previously mentioned. All the applications must be signed by the Unit Manager and the District Manager or the Head of the Department before submitting them for consideration.

The completed applications must be sent to the Secretary of Walgreens Benefits Fund, attention Department of Human Resources, 102 Wilmot Road (MS#1242), Deerfield, Illinois, 60015.

No aid offered or promised shall be able to be required until the employee receives the actual approval from the Benefits' Fund.

3.32 Assistance Program for the Employees

Walgreens offers an Assistance Program for those employees who are going through difficult situations on the job or in their personal lives such as stress, depression, loss of a relative or a friend, financial stress and domestic violence. The Assistance Program for Employees offers psychological support sessions to help the employees deal with such situations. For more information about this benefit, get in touch with the Department of Human Resources at the Central Offices of Walgreens in Puerto Rico.

4. Rules and Norms of the Company that Govern Conduct

4.1 Progressive Discipline

A fair discipline program allows the employees to know that what is expected of them and what they can expect if they do not follow the norms and rules, or if they perform their work in a negligent or tardy manner, going against Walgreens norms of quality and service. Generally, an employee is not dismissed because of a single violation to the Company's policies, rules or norms, except under circumstances that merit it. The usual sequence of corrective measures includes a verbal warning, a written warning, suspension, and finally, termination of employment. Walgreens, notwithstanding, reserves for itself the right to take the corrective measure that it deems to be appropriate in view of the circumstances presented in each case, including the seriousness of the violation, previous violations to Walgreens' norms, and any other circumstance that Walgreens deems to be relevant.

Opportunity to Explain

It is expected that each employee cooperate with the internal investigation processes that imply the possibility of discipline. Every employee shall have the opportunity to respond to any step of the progressive discipline, except in cases that imply dismissal. In the event that the person does not cooperate, he/she shall be suspended without pay until a determination is reached based on the information obtained.

Conduct that Justifies the immediate Termination of Employment

As mentioned in the introduction to this manual, no manual may specify all the conducts that may lead to discipline or to the termination of employment. Therefore, Walgreens reserves for itself the right to apply penalties and/or terminate the employment of any employee due to violations and offenses not specified in this regulation. Notwithstanding, there are certain types of conduct that affect the work environment or the operations of the pharmacies which could lead to the immediate dismissal of the employee, although it may be an isolated violation. These include, but are not limited to:

- Any type of physical violence in Walgreens' premises.
- Bearing of firearms, knives, explosives, or any other dangerous weapons in Walgreens' premises.
- Consuming alcoholic beverages or using controlled substances in the premises of Walgreens, or showing up at Walgreens' premises under the influence of alcohol or of controlled substances.
- Providing false information to the Company, or falsifying documents such as the work history record, the attendance and payroll records, entry and exit times, time cards of hours worked, or any document which forms part of the personnel file.
- Stealing, attempting to steal, destroying or vandalizing property belonging to Walgreens, to clients, or to other employees, regardless of the value or the amount involved. Walgreens considers the keeping of the coins dispensed by the change machine of the cash registers to be theft.
- Violating the Policy Against Harassment and Discrimination, or committing acts of reprisal.
- Violating the confidentiality policy of Photo development, or the Photo development Policy regarding where there is nudity and/or explicit sexuality.

- Using foul language, threats or making indecent or hostile gestures in the premises of Walgreens.
- Taking any action which puts the safety or health of Walgreens clients or of any Company employee at risk.
- Being absent from work for three (3) consecutive days without notifying such absence to the management.
- Not cooperating with the Company's warrants, searches or investigations.
- Mistreating or being disrespectful to a client.
- Participating in gambling, or making bets at Walgreens during working hours.
- Insubordination or disobedience to an order, task or managerial instruction relating to your work. (This includes abandoning the work station or Walgreens' premises without the appropriate authorization, or being disrespectful to persons in positions of authority).
- Consuming merchandise before paying for it, or allowing someone to do the same including damaged or expired merchandise and any merchandise known as 1506.
- Participating in horseplay with a coworker.
- Refusing a transfer to another store or place of employment.
- Punching the time card of another employee, allowing in some manner that another employee punches yours, and any other activity that results in reporting false hours of work, such as, for example, adjusting overtime hours to be paid as regular hours. (This shall be considered dishonest and fraudulent against Walgreens).
- Changing, adjusting or in some manner altering the time records or punches to register hours that do not reflect the exact hours which an employee has worked.
- Committing negligent or dishonest acts which may impose legal liability, cause losses or affect Walgreens' assets.
- Violating any local, state or federal law or regulation, or causing another employee to violate said rules or regulations.
- Violating the Pharmacy Act and its regulations, or the policies, laws or our regulations which regulate the safety and other activities from the pharmacist's dispensing booth, including the Pharmacy Code of Conduct.
- Committing acts of fraud or dishonest acts, such as the improper use of the Promotional Money, the coupons and the purchaser's loyalty card.
- Issuing employee or professional discounts to persons who do not qualify for said discounts, or causing or allowing another employee to issue employee or

professional discounts to persons who do not qualify for said discounts.

- Committing acts or omission which result in the loss of money or objects from the store's safety deposit box.
- Improper or unauthorized use of the Company's equipment, such as cellular phones and computers.
- Selling or allowing the sale of alcohol to minors under 18 years of age.

The fact that Walgreens does not take immediate action with regard to a violation to one of its rules does not mean that it accepted said conduct on the part of the employee, or waived its right to take disciplinary measures regarding said conduct or violation in the future.

4.2 Walgreens' Policy Against Harassment and Discrimination

The Walgreens Company has as policy that the employees be entitled to work in a verbal or physical harassment free environment due to age, race, color, sex, sexual orientation, origin or social condition, nationality, political affiliation, political or religious ideas, citizenship status pursuant to the Immigration Reform and Control Act of 1986, civil status, victim of domestic violence, disability, or any other condition protected in accordance to the requirements of the local, state and federal laws.

Walgreens' policies strictly prohibit any harassing conduct for reasons prohibited by law, which affect a person's employment, which interfere with the execution of a person's work, or which creates an intimidating, hostile or offensive environment, even when the harassing behavior does not reach the level of a legal action due to said conduct. No harassment or discrimination on the part of any Walgreens employee shall be tolerated, nor on the part of any person who visits our stores or maintains a business relationship with Walgreens, including any client or businessman.

Any person who violates Walgreens' Policy Against Harassment and Discrimination on the job shall be subject to serious disciplinary measures, including the termination of employment.

What is Sexual Harassment?

Sexual harassment includes, but is not limited to:

- Making undesired sexual advances, or requiring sexual favors, or any verbal or physical conduct of a sexual nature as a condition for the continuation of a person's employment.
- Submitting an employee to said conduct based on employment decisions that affect the employee.
- Creating an intimidating, hostile or offensive work environment due to verbal or physical conduct of a sexual nature.

What Constitutes Harassing Behavior?

Harassing behavior may be verbal or physical. Examples of inappropriate behavior include, without limiting themselves to:

- **Verbal** - Discriminatory comments, epithets, demeaning comments, insults, threats or jokes about personal or physical features, or of a personal or physical nature, just like sexual innuendoes, undesired requests for any type of sexual favor, or dates, questions about personal sexual matters, or sexually suggestive comments.
- **Non-verbal** - Suggestive or insulting noises, frivolous looks, obscene gestures, putting announcements on the bulletin board or having on the job objects, written material, posters, cartoons or pictures which are of a sexually suggestive, pornographic or discriminatory nature, or making use of any means of communication or multimedia tools through the computer network, or through any electronic medium, for the purpose of making any type of undesired sexual approach.
- **Physical** - Inappropriate bodily touches, hugs, pinching, brushing against, touching or massaging the body, unnecessary closeness, forcing sexual relations, or any other intimidating or undesired physical contact.

Walgreens acknowledges that the new technologies such as the Internet, computers, cellular phones, the electronic mail system (e-mail), text messages and other means of electronic communication have become necessary and important tools for the company. However, these means of communication may be abused and Walgreens acknowledges that harassment as well as discrimination could occur by means of these media, including social networks such as Facebook, Twitter and all of their equivalents. As a result, Walgreens expressly forbids harassment and discrimination by means of the use of these media and reserves for itself the right to block and monitor electronic communications among its employees, as may be necessary to ensure faithful compliance with this policy. See, section 2.14 Policy Regarding Use of Electronic Resources.

How Can I Report a Problem?

Employees who believe that they have been the object of, or have observed harassment and/or discrimination of any kind, have the duty to report said harassment and/or discrimination in writing. The employees may report harassment or discrimination to their Manager, to their District Manager, or to the Department of Human Resources at the Central Offices in Puerto Rico. If not satisfied with the results of their grievance or complaint, they may also take the same to the Supervisor of the Loss Prevention Department, to the Loss Prevention line at 1-800-666-5677, or to the Department of Employee Relations, 1-847-315-4455. Walgreens counts with personnel, masculine as well as feminine, available to investigate these matters.

Every grievance shall be investigated in the order of priority, together with the investigation coordinated by the Department of Employee Relations. Even when Walgreens must collect all the information that is relevant, the investigation shall be of a confidential nature and the same shall be made public (or parts of the same) only in the event that it is strictly necessary.

Walgreens expects all of its employees to address their questions relating to discrimination and/or harassment to the Department of Human Resources at the central offices in Puerto Rico, or to the Department of Employee Relations and guarantees that these consultations can be made without fear of reprisals. All the decisions shall be reviewed (if requested) by the Vice-President of Human Resources, 200 Wilmot Road, Deerfield, Illinois 60015.

It is expected that everyone back Walgreens in its objective of maintaining an employment site free from discrimination and/or harassment. Only if the possible acts of discrimination and/or harassment are immediately,

exactly and honestly reported is it that Walgreens may carry out investigations and in that manner take the appropriate corrective steps. Being dishonest with regard to a discrimination and/or harassment claim may be considered as serious as the act of harassment or discrimination itself, and may result in disciplinary sanctions that include dismissal.

None of the above prevents the Open Door Policy for the reporting of sexual harassment or discrimination incidents from being utilized.

Responsibility of the Management

Any Manager who ignores and/or knowingly hides information about discrimination and/or harassment in violation of this policy shall be subject to serious disciplinary measures, which could include the termination of employment.

Walgreens prohibits all kinds of reprisals against the employee for filing a grievance under this policy in good faith, for helping in the investigation of a grievance, or for opposing oneself to illicit practices on the job. If it were to be determined that any employee has taken reprisals against the other, he/she shall be subject to serious disciplinary measures, including the termination of employment.

However, if after investigating a harassment or discrimination grievance, Walgreens were to determine that the grievance was not presented in good faith, or that the employee intentionally provided false information with regard to the grievance, corrective action may be taken against the person who filed the grievance, or who provided false information, including the dismissal.

4.3 Policy Against Discrimination due to Disability

At Walgreens, we believe in providing equal employment opportunities to all. This includes our employees, as well as candidates for employment, who could suffer from an emotional and/or physical condition which substantially limits one or more principal activities of life. Consistent with this corporate policy, discrimination against employees and/or candidates for employment with regard to their terms and/or conditions of employment due to their suffering an emotional and/or physical condition that substantially limits one or more of the principal activities of life shall not be tolerated.

The Company will evaluate the possibility of providing a reasonable accommodation to any disabled person, according to how the concept is defined in the applicable laws, when doing so does not constitute an onerous burden for the Company. Walgreens exhorts any person who understands that they have an impediment which needs a reasonable accommodation to request the same **in writing**. As an employee, if you qualify as a person protected by law, you have the same responsibility as Walgreens of cooperating in a constructive and interactive manner to determine whether a reasonable accommodation can be provided.

Get in touch with the Department of Human Resources to be oriented about this policy and obtain the appropriate applications.

4.4 Policy Against Reprisals

The reprisals against any employee who files charges of violations to Walgreens' norms of conduct and/or norms against discrimination or harassment on the job are prohibited by Walgreens and by the law. It is the policy of Walgreens to not tolerate such behavior. If it is determined that an employee has taken reprisals against one person, that person shall be subject to serious disciplinary measures, including the possibility of the termination of their employment.

4.5 Policy Regarding Attendance and Tardiness

Attendance

Attendance and timeliness on the days scheduled for work are essential to be able to fulfill our business commitments. However, we recognize that it is also important to schedule time to deal with the personal needs of the home and of the family and to rest and relax. That is why Walgreens provides free time with pay for vacation leave and holidays.

Your timely attendance to work on the designated days is very important and you must record solely and exclusively your attendance at work during the work schedules and hourly schedules assigned by your Supervisor. To punch the time card of another employee, to allow in some manner that another employee punches your time card, and any other activity which results in the reporting of false work hours shall be considered a dishonest and fraudulent action against Walgreens and shall result in a disciplinary action, including employment termination.

Logically, your attendance is the most essential function of your work, since it's the only way that you can perform your tasks. In addition, the lack of timely attendance to work affects the operations of the pharmacies by creating: (1) more work for the other employees, (2) interruptions in the work schedules, (3) inefficient service to our clients, (4) additional hours of pay to other employees, and (5) other situations which negatively affect the administration of the pharmacies. For such reason, violations to this policy could imply discipline, including written or verbal warnings, suspension without or with pay and the termination of your employment with our Company, depending on the seriousness of the action and the discretion of your Manager.

If for any reason of weight it is not possible for you to show up at work, it's your responsibility to notify your Manager within the first two (2) hours prior to beginning your work schedule. If the Manager is not available, you must leave a message for the Manager with the Executive Assistant or the Assistant Manager in the work shift, together with a telephone number where you may be contacted. A Supervisor shall return your call. When you contact the Manager you must let him/her know how long you're going to be absent and when do you expect to return to or arrive at work, as applicable. If the absence continues beyond the first day, you must notify your attendance to your Supervisor on a daily basis.

Unless the situation is of such nature that it prevents it, the call must be made by the employee himself/herself directly to the Manager. Walgreens will not tolerate an employee being absent without having informed the Company, as established in this Policy, that he/she is going to be absent and the reasons for it. Calling is the responsibility of any employee who's absent. This allows the Company to organize itself to temporarily cover your functions and help other employees to be able to continue working in your absence.

You must present a Medical Certificate to your Supervisor if you are going to be absent during a period which exceeds two (2) consecutive days for reasons of personal illness, documenting that you were disabled to work during the days when you were absent. Said certificate must have been obtained during the date of the illness - not after the illness - and have been provided by the medical personnel that took care of you or provided you with care during your absence to work. In the event of there being doubt about said certificate, Walgreens reserves for itself the right to question the certificate under the applicable laws of Puerto Rico and to request a second opinion. In like manner, if there is suspicion to the effect that you are abusing your sick leave, Walgreens reserves for itself the right to ask you for a medical certificate for absences of two days or less. The certificates have to be presented to your Manager, Executive Assistant or Assistant working the shift the day that you return to work. If you are hospitalized and cannot fulfill the responsibilities previously described, you have to contact your Manager as soon as possible. Upon returning to your work, it shall be your responsibility to present all official and adequate documents

to excuse your absence and inability to contact your managerial team due to the hospitalization.

If you are absent for more than three (3) consecutive days without notice, the Company shall consider it as a voluntary abandonment of employment.

It's important to understand that the days granted under sick leave do not exempt you from your attendance responsibility and do not justify excessive absences which affect the pharmacy's operations in a negative manner.

At Walgreens, we do not tolerate excessive or unjustified absences. When an employee's absences are excessive or reflect a pattern and/or result in the deterioration of the efficiency and productivity of the employee, he/she shall be subject to corrective measures, which may reach permanent separation from separation and salary. For example, the disciplinary procedure will be activated when one of the following patterns of absenteeism takes place: (1) absences before and/or after the day off; (2) absences on the day before and/or after a holiday; (3) absences when it's your turn to work outside of your regular work schedule; and (4) absences when it's your turn to work on weekends.

The days of absence due to illness shall be duly paid only if the requirements stated in this paragraph are fulfilled. Unjustified absences shall not be charged to any sick leave.

Tardiness

Our business requires the timely attendance to work from all of its employees. When you arrive late at work, you affect your performance, as well as the other employees who have to take charge of your work until you return. If due to any inevitable cause you are to arrive late, you must notify your Manager in advance at least two (2) hours prior to the beginning of your work shift. If it's an unforeseen absence or tardiness, the employee must notify it no later than 30 minutes after the hour of entry.

If the Manager is not available, you must leave a message for the Manager with the Executive Assistant or the Assistant Manager on the work shift, together with a telephone number where you can be reached, if necessary. When you contact the Supervisor you must let him know by how long you are going to be late and when is it that you expect to arrive at work. Unless the situation is of such nature that prevents it, the call must be made by the employee himself/herself, directly to your Supervisor. Walgreens will not tolerate an employee arriving late without letting the Company know, as established in this Policy, that he/she will be arriving late and the reasons for it. Calling is the responsibility of any employee who's late to begin his work shift.

A tardiness occurs when an employee is not at his/her work station, working on time pursuant to his schedule. Therefore, this policy also applies when an employee is late for work after lunch or some break. When an employee does not punch on time, the employee must see the Manager, immediately. The time worked shall be calculated as if the employee had begun to work from the time that it's reported to the Supervisor.

Early Departures

No employee may abandon his work area or place without the proper authorization. If you abandon your work before the time designated for the break, lunch or departure time, you are violating an attendance rule, which could imply disciplinary measures.

5 Policies that Apply to the Employees of the Prescription Counter

5.1 Pharmacy Laws, Policies and Ethics

Walgreens, always close to you to give you a hand. Honesty and integrity are the cornerstones on which Walgreens was founded and on which we operate. We are proud that Walgreens' employees have always maintained superior standards of conduct. It's our intention that the Walgreens Company always handle its affairs in accordance to the highest standards of performance and that the business and shares of all of Walgreens' employees be in compliance with the spirit of the laws, the Policies and the codes of ethics under which we operate and live.

Our clients trust their health and welfare, as well as that of their loved ones, to us. By bringing their needs for medicines and prescriptions to us, they are trusting that we are going to be providing professional, sensitive and high quality service. They trust that we are honest in all of our endeavors and that we respect their right to privacy.

Form and appearance are important. We hope that Walgreens' employees do what is correct and that they conduct themselves in such manner that others visualize them as having the highest standards of professional and personal conduct.

There is no other way to ensure appropriate conduct that is not by means of the knowledge and commitment of every employee. To such effect, we annually publish the Policy Regarding Controlled Substances and we have published a list of some of our legal and ethical expectations. Although this list does not include everything, it serves as a frame of reference for the handling of the most common and sensitive situations in which you can find yourself while working at a Walgreens pharmacy.

Due to the fact that we are convinced that trust is based on strict compliance with legal and ethical conduct, we require that the entire personnel working in a pharmacy indicate their ethical commitment.

We know that you are in agreement to the effect that legal and ethical behavior are the grounds on which Walgreens is the pharmacy in which all America trusts.

Walgreens' employees who work in the Pharmacy Department shall comply with the following:

- Protect the health and safety of all the clients/patients of Walgreens by observing the Company's operational standards and by making sure that all the prescriptions are correctly processed.
- Maintain the privacy and confidentiality of the information for each patient and the files of the Pharmacy Department.
- At all moments act observing the Operations Policy standardized for the Pharmacy Department (SOP).
- Promptly report adverse reactions to medicines, incidents and errors.
- Report to the appropriate supervisor or to our Loss Division thefts, losses, violations to Policies or any other illegal or unethical activity observed.
- Promptly request consultations from the appropriate sources when there are questions with regard to the application of Policies and/or pharmacy laws.

- Take the appropriate precautionary measures to maintain the physical safety of the Pharmacy Department.

Walgreens' employees who work in the Pharmacy Department will **NOT** do the following:

- Dispatch any prescription without the proper authorization.
- Falsify or in any measure alter a prescription, or acquire a medicine using falsified prescriptions.
- Enter a false prescription into the system, or dispatch the same knowing that it is false.
- Dispatch a prescription without the proper authorization once its expiration date has passed, or one that does not have refills, in accordance to the pharmacy rules and regulations.
- Dispatch more than the amount prescribed without the proper authorization.
- Remove, take away or consume a medicine without a valid prescription and/or without paying for the same.
- Charge or accept payments which are higher or lower than the price generated by the system without the proper authorization.
- Mark in the cash register amounts which are lower than the amount purchased at the pharmacy and/or deductibles.
- Issue price discounts inappropriately.
- Sell a medicine or any other product to a person, persons or business for the purpose of obtaining personal benefits.
- Charge false or non-existent prescriptions to a health plan, or exceed the amounts authorized in accordance to the parameters of the plan.
- Order medicines from an alternate sources (no-whse.) without the proper authorization.
- Violate Walgreens' policies, or the state and federal pharmacy laws.
- Cover up or hide a dispatch error, or alter files.
- Seek or accept, directly or indirectly any payment, loan, service, excessive entertainment, trips or gifts of substantial value from any person or representative who has business with or is trying to do business with Walgreens.

5.2 Policy regarding Continuous Quality Improvement or CQI.

Policy

The Continuous Quality Improvement (CQI) is designed to promote precision in the dispatching of prescribed medications, the development and training of the pharmacy personnel, and the consistency in providing pharmaceutical services of care. The program includes specific guidelines

for the handling of the patients and of the ones that prescribe the prescriptions and the review of the pharmacy procedures in any instance in which an employee becomes aware of an external prescription event.

Total and strict compliance with this Policy on the part of all the employees is critical for the CQI program to be effective. In the absence of extreme circumstances, Walgreens will support all of its employees who fully comply with the CQI Policy. Not complying with the CQI procedure, including the lack of completion of the STARS form, may result in a disciplinary sanction, including the termination of employment.

5.3 Policy regarding Corrective Discipline via Incorrect Package to the Patient

The purpose of this Policy is to improve the Continuous Quality Handling Program or CQI and to help reduce the number of packages with incorrectly prescribed medicines which are sold to patients. This Policy also expects to reduce the number of external events of Incorrect Packing to the Patient that occur in our pharmacy department. Under this policy the process of constructive discipline is begun when the district supervisors, the personnel from the Pharmacy, or the store management have been notified that a patient has received an erroneous medicine packing.

5.4 Policy Regarding the Administration of Vaccines

Walgreens expects that all of its pharmacists obtain all the necessary certifications and comply with all the requirements of law for the administration of vaccines. As a Walgreens pharmacist, the administration of vaccines is an essential part of your job functions. Please refer to the Policy regarding this subject at StoreNet to obtain more details about this Policy.

5.5 Policy Regarding Long and/or Acrylic Fingernails and the Use of Jewelry.

Walgreens has as principal interest the prevention of infection among patients, employees and relatives promoting a healthy work environment by means of the reduction of bacteria. Long and/or artificial nails are potential reserves of bacteria. In like manner, the excessive use of jewelry (multiple rings and bracelets) increases the amount of microorganisms that are transported in the hands and the risk of tearing the gloves or of utilizing them inappropriately.

Therefore, all the personnel from the prescription counter offering direct care to patients and/or handling samples or preparing medicines or solutions to patients shall absolutely abstain from utilizing long nails (natural or artificial) and excessive jewelry. The jewelry permitted shall be limited to one band ring and a watch.

Natural nails shall be kept short (a length no longer than 1/8 of an inch over the tip of the fingers). The nail polish must be clear. The same must not be cracked, since cracks are a place for the deposit of microorganisms.

Not complying with this norm shall imply disciplinary measures, including the possibility of dismissal.